

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re Novartis Wage and Hour Litigation

06-MD-1794 (PAC)

**UNOPPOSED MOTION FOR
WITHDRAWAL AND
SUBSTITUTION OF COUNSEL**

Pursuant to Local Civil Rule 1.4, Defendant Novartis Pharmaceuticals Corporation (“NPC”) respectfully submits this unopposed motion to allow the withdrawal of NPC’s counsel of record, and the substitution of new counsel for NPC, as set forth below. In support of this motion, NPC, through the undersigned counsel, state as follows:

1. NPC’s lead counsel in this action has been the law firm of Vedder Price P.C. (“Vedder Price”). NPC and Vedder Price have agreed that Vedder Price should be allowed to withdraw as counsel of record for NPC, and that the law firm of Cravath, Swaine & Moore LLP (“Cravath”) should be substituted as lead counsel, and the law firm of Kaye Scholer LLP (“Kaye Scholer”) should be added as counsel, for NPC in this action.

2. Vedder Price has represented NPC in this action from its inception in 2006. Liability discovery has been completed, dispositive motions have been decided, and the case has been remanded to this Court by the Second Circuit Court of Appeals following denial of NPC’s petition for *certiorari* by the United States Supreme Court.

3. NPC does not believe that this withdrawal and substitution of counsel will cause any delay to the schedule for this case.

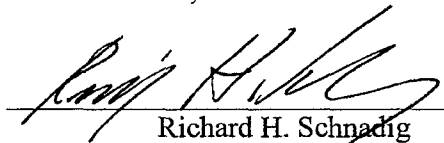
4. NPC, through its counsel, has communicated to counsel for the Plaintiff class its intention to move for the withdrawal and substitution of counsel as set forth herein. Plaintiffs’ counsel stated that Plaintiffs do not oppose this motion.

WHEREFORE, NPC respectfully requests that the Court grant its motion to allow the law firm of Vedder Price P.C. to withdraw as counsel of record for NPC, and allow the law firms of Cravath, Swaine & Moore LLP and Kaye Scholer LLP to substitute in as counsel of record for NPC. A proposed Order granting this unopposed motion is submitted herewith.

Dated: March 9, 2011

VEDDER PRICE P.C.,

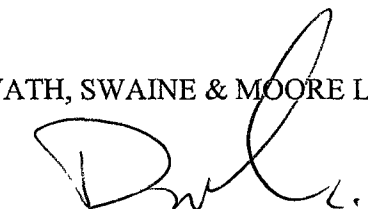
by


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CRAVATH, SWAINE & MOORE LLP,

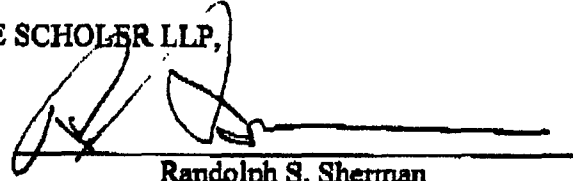
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A handwritten signature in black ink, appearing to read 'R. Sherman', is written over a horizontal line.

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